

INTERVENTION
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BEFORE THE ARIZONA CORPORATION COMMISSION

WILLIAM A. MUNDELL
CHAIRMAN
JIM IRVIN
COMMISSIONER
MARC SPITZER
COMMISSIONER

Arizona Corporation Commission

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IN THE MATTER OF THE INVESTIGATION OF
THE COST OF TELECOMMUNICATIONS
ACCESS.

DOCKET NO. T-00000D-00-0672

MOTION TO INTERVENE

In accordance with A.A.C. R14-3-105, Citizens Communications Company, on behalf of its three incumbent local exchange carrier affiliates operating in Arizona, applies to the Arizona Corporation Commission for an order granting leave to intervene in the above-captioned docket. Those three local affiliates are Frontier Citizens Utilities Rural, Frontier Communications of the White Mountains and Navajo Communications Company (collectively "Citizens").

Citizens is directly and substantially affected by the on-going proceedings in this docket. The Commission is investigating the cost of telecommunications access. Citizens is an incumbent local exchange provider in Arizona, which requests and provides access services to other telecommunications companies. As a result, Citizens has a substantial and direct interest in the outcome of this docket.

Citizens' participation in this proceeding will not unduly broaden the issues raised. The names, addresses and telephone numbers of the persons upon whom service of all documents should be made are:

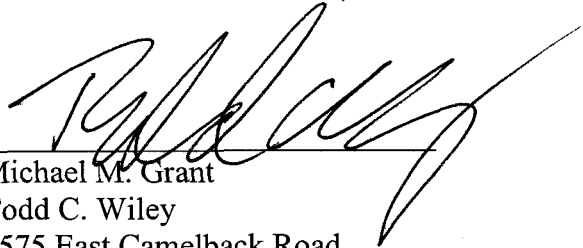
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4 Curt Huttshell
5 Director, State Government Affairs
Citizens Communications Company
6 4 Triad Center, Suite 200
Salt Lake City, Utah 84180

7 For the reasons set forth above, Citizens respectfully requests that the Arizona
8 Corporation Commission issue an order granting Citizens intervention in this proceeding.

9 DATED this 8th day of March, 2002.

10 GALLAGHER & KENNEDY, P.A.

11
12 By 
13 Michael M. Grant
14 Todd C. Wiley
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15 Attorneys for Citizens Communications
Company

16 **Original** and ten copies filed this
17 8th day of March, 2002 with:

18 Docket Control
19 Arizona Corporation Commission
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20 **Copies** of the foregoing hand-delivered
21 this 8th day of March 2002, to:

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